

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
WESTERN DIVISION**

TRACIE LYNN NORRIS

PLAINTIFF

VS.

CIVIL ACTION NO. 3:08CV118-MPM

**TUPELO PCH, LLC d/b/a
MAGNOLIA MANOR AT TUPELO**

DEFENDANT

**PLAINTIFF'S MOTION FOR ATTORNEYS' FEES
AND EXPENSES**

COMES NOW Plaintiff Tracie Norris, by and through counsel, as the prevailing party in this action, and moves this Court for an award of reasonable attorneys' fees and expenses. The following exhibits support this motion:

Exhibit "A": Affidavit of Jim Waide, Ron L. Woodruff, and Rachel M. Pierce;

Exhibit "B": Memorandum Opinion in the case styled *Cliff Hardy v. City of Tupelo, Mississippi*; U.S.D.C. No. 1:08-cv-28-SA;

Exhibit "C": Declaration of Taylor B. Smith;

Exhibit "D": Affidavit of Armin J. Moeller; and

Exhibit "E": Laffey Matrix, categorizing attorneys' fees based upon number of years in practice.

A brief in support of this motion is being served simultaneously herewith.

WHEREFORE, Plaintiff prays reasonable attorneys' fees, in an amount to be set by this Court, be granted. Additionally, out-of-pocket expenses in the amount of \$2,531.85 should be granted.

RESPECTFULLY SUBMITTED, this the 9th day of August, 2011.

TRACIE LYNN NORRIS, Plaintiff

By: /s/ Rachel M. Pierce

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Rachel M. Pierce, MS Bar No. 100420
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

This will certify that undersigned counsel for Plaintiff has this day filed the above and foregoing **Plaintiff's Motion for Attorneys' Fees and Expenses** with the Clerk of the Court, utilizing the federal court electronic case data filing system (CM/ECF), which sent notification of such filing to the following:

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THIS, the 9th day of August, 2011.

/s/ Rachel M. Pierce
Rachel M. Pierce